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*Attorneys for Defendants Americare, Inc.
Mario Gonzalez and Jennifer Gonzalez*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ELEVATION HEALTH, LLC, a foreign limited
liability company,

Plaintiff,

vs.

AMERICARE, INC., a domestic corporation;
MARIO GONZALEZ, individually; JENNIFER
GONZALEZ, individually; DOES I through X;
and ROE CORPORATIONS I through X,

Defendants.

CASE NO.: 2:22-cv-01590-GMN-NJK

**STIPULATION AND PROPOSED
ORDER EXTENDING TIME FOR
DEFENDANTS TO RESPOND TO
COMPLAINT**

Plaintiff Elevation Health LLC (“Plaintiff”) and Defendants Americare, Inc., Mario Gonzalez and Jennifer Gonzalez (collectively “Defendants,”) and collectively with Plaintiff, the “Stipulating Parties”), by and through their respective counsel, hereby stipulate as follows:

WHEREAS, Plaintiff filed its Complaint on September 21, 2022;

WHEREAS, Defendants Mario Gonzalez and Jennifer Gonzalez were served on October 4, 2022 with their response due on October 25, 2022 (Dkts. 5-6);

WHEREAS, Defendant Americare, Inc. was served on October 13, 2022 with its response due on November 3, 2022 (Dkt. 7);

1 WHEREAS, Defendants have recently retained counsel;

2 WHEREAS, the Stipulating Parties agree that good cause exists to extend the time for
3 Defendants to answer, move, or otherwise respond to the Complaint to November 21, 2022;

4 WHEREAS, the Stipulating Parties have not previously requested or agreed to any
5 extension of time for Defendants to respond to the Complaint; and

6 WHEREAS, this change will not alter the date of any event or any deadline already
7 fixed by Court order.

8 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Stipulating
9 Parties, through their respective counsel, that the time for Defendants to answer, move, or
10 otherwise respond to the Complaint shall be extended to November 21, 2022.

11 **IT IS SO STIPULATED.**

12 DATED this 8th day of November, 2022.

13 COHAN PLLC

HUTCHISON & STEFFEN, PLLC

14 /s/ Chasen Cohan

/s/ Todd W. Prall

15 _____
16 Chasen Cohan (12349)
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18 Las Vegas, NV 89118

Attorneys for Elevation Health

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*Attorneys for America, Inc, Mario Gonzalez
and Jennifer Gonzalez*

21 **IT IS SO ORDERED.**

22
23 Dated: November 9, 2022

24 
25 _____
26 United States Magistrate Judge
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